

Isuzu's Request for an exemption from CDL's:

Isuzu's request should be denied. Regardless of Isuzu's engineer's and mechanic's ability there is one very important skill the individuals do not have: How to drive vehicles with a steering wheel on the left side of the vehicle.

Japan's vehicles are steered from the right side of the vehicle. As a Department of Defense employee stationed in Japan, I was restricted to base and required to practice driving inside the confines of the military base until I could acclimate myself to the rigors of driving a vehicle with the steering wheel on the right.

I see no difference in the need to familiarize Japanese drivers. The need to train and qualify the drivers should be emphasized as the vehicles being operated have the potential to cause a great deal of damage to public and private property as could result in death to the drivers or others in the vicinity.

I can recall no areas of Japan that would equal the downhill grades on the Grapevine on I-5 in California leading into Los Angeles, CA - Spotted Wolf Pass on I-70 near Green River, UT - Loveland Pass on I-70 or Wolf Creek Pass On US-550 in Colorado.

There are also other considerations. The driver's ability to communicate in English with law-enforcement officials.

I believe Isuzu could easily hire capable drivers to operate their test vehicles in the United States or take the necessary measures to train their drivers to obtain a CDL issued in the United States.

Other areas that need addressing are hours of service (HOS) and medical examiner's certificates. Since the vehicles being operated qualify for a CDL the rules pertaining to HOS physicals apply.

I sincerely believe the cultural differences and operating rules are too far separated for drivers from Japan to not be trained and familiarized to operate commercial motor vehicles in the United States.